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Attorneys for Plaintiffs  
 Chanel, Inc. and Louis Vuitton Malletier, S.A.

THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHANEL, INC., a New York corporation  
 and LOUIS VUITTON MALLETIER,  
 S.A., a foreign business entity,

Plaintiffs,

v.

TONY BOSINI and DOES 1-10,  
 individually and jointly, d/b/a  
 REPLICAMASTER.COM,  
 SHOPREPLICA.COM,  
 BUYHIGHREPLICA.COM,  
 EREPLICABAGS.COM,  
 EXACTWATCHES.NET,  
 REPLICAHOURS.COM,  
 SWISSREPLICA.US,  
 THEWATCHESPRICEINDEX.INFO, and  
 YOURREPLICAWATCH.COM,

Defendants.

Case No. C-09-1972 MHP

ORDER

**STIPULATED CONSENT  
 PRELIMINARY INJUNCTION**







WHEREAS, this action having been commenced by the Plaintiffs, Chanel, Inc. ("Chanel")  
 and Louis Vuitton Malletier, S.A. ("Louis Vuitton") (collectively the "Plaintiffs") against the

Defendant Tony Bosini d/b/a Replicamaster.com, Shopreplica.com, Buyhighreplica.com, Ereplcabags.com, Exactwatches.net, Replicahours.com, Swissreplica.US, Thewatchespriceindex.info, and Yourreplicawatch.com (the "Defendant"), alleging *inter alia*, trademark counterfeiting and trademark infringement, and false designation of origin and a copy of the Summons, and Complaint having been served upon the Defendant:














IT IS STIPULATED, ORDERED, ADJUDGED AND DECREED that:

1. This Court has jurisdiction of the subject matter of all counts of this action and over the named parties hereto.

2. Chanel is the owner of the following trademarks (the "Chanel Marks") in connection with high quality handbags, wallets, watches, bracelets, earrings, and necklaces:

<u>Mark</u>	<u>Reg. No.</u>	<u>Reg. Date</u>
CHANEL	0,626,035	May 1, 1956
	1,314,511	January 15, 1985
CHANEL	1,347,677	July 9, 1985
	1,734,822	November 24, 1992
CHANEL	1,733,051	November 17, 1992
	3,022,708	December 6, 2005
	3,025,934	December 13, 2005
	3,025,936	December 13, 2005
CHANEL	0,955,074	March 13, 1973
CHANEL	1,571,787	December 19, 1989
J12	2,559,772	April 9, 2002
CHANEL	3,133,139	August 22, 2006
	1,501,898	August 30, 1988
CHANEL	0,612,169	September 13, 1955
CHANEL	0,902,190	November 10, 1970

3. Louis Vuitton is the owner of the following trademarks (the "LV Marks") in connection with high quality handbags, wallets, watches, earrings, and necklaces:

<u>Mark</u>	<u>Registration No.</u>	<u>Registration Date</u>
	0,286,345	August 25, 1931
	0,297,594	September 20, 1932
LOUIS VUITTON	1,045,932	August 10, 1976
	1,519,828	January 10, 1989
	1,653,662	August 13, 1991
	1,655,564	September 3, 1991
LOUIS VUITTON	1,990,760	August 6, 1996
	2,098,630	September 23, 1997
	2,177,828	August 4, 1998
	2,181,753	August 18, 1998
	2,263,903	July 27, 1999
VUITTON	2,657,903	December 10, 2002
	2,773,107	October 14, 2003
	2,828,919	April 6, 2004
	3,107,072	June 20, 2006
	2,378,388	August 22, 2000
LOUIS VUITTON PARIS		

4. The Defendant and his respective officers, agents, servants, employees and attorneys, and all persons in active concert and participation with them are hereby preliminarily restrained and enjoined, pending termination of this action from:

- A. manufacturing or causing to be manufactured, importing, advertising, or promoting, distributing, selling or offering to sell counterfeit and infringing goods; bearing the Chanel Marks and/or the LV Marks;
- B. using the Chanel Marks and/or the LV Marks in connection with the sale of

- 1 any unauthorized goods;
- 2 C. using any logo, and/or layout which may be calculated to falsely advertise the
- 3 services or products of the Defendant as being sponsored by, authorized by,
- 4 endorsed by, or in any way associated with the either of the Plaintiffs;
- 5 D. falsely representing himself as being connected with the Plaintiffs, through
- 6 sponsorship or association,
- 7 E. engaging in any act which is likely to falsely cause members of the trade
- 8 and/or of the purchasing public to believe any goods or services of the
- 9 Defendant, is in any way endorsed by, approved by, and/or associated with
- 10 either of the Plaintiffs;
- 11 F. using any reproduction, counterfeit, copy, or colorable imitation of the
- 12 Chanel Marks and/or LV Marks in connection with the publicity, promotion,
- 13 sale, or advertising of any goods sold by the Defendant, including, without
- 14 limitation, high quality handbags, wallets, watches, bracelets, earrings, and
- 15 necklaces;
- 16 G. affixing, applying, annexing or using in connection with the sale of any goods,
- 17 a false description or representation, including words or other symbols tending
- 18 to falsely describe or represent the Defendant's goods as being those of the
- 19 Plaintiffs, or in any way endorsed by the Plaintiffs;
- 20 H. offering such goods in commerce; and from otherwise unfairly competing
- 21 with the Plaintiffs.
- 22 I. secreting, destroying, altering, removing, or otherwise dealing with the
- 23 unauthorized products or any books or records which contain any information
- 24 relating to the importing, manufacturing, producing, distributing, circulating,
- 25 selling, marketing, offering for sale, advertising, promoting, renting or
- 26 displaying of all unauthorized products which infringe the Chanel Marks
- 27 and/or the LV Marks; and
- 28

J. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in subparagraphs (A) through (I).

SO STIPULATED:

**Plaintiffs:** Chanel, Inc. and Louis Vuitton Malletier, S.A.

By their Attorney:

J. ANDREW COOMBS,  
A PROFESSIONAL CORPORATION

By: Nicole L. Drey

J. Andrew Coombs

Nicole L. Drey

Attorneys for Plaintiffs

Chanel, Inc. and Louis Vuitton Malletier, S.A.

**Defendants:** Tony Bosini d/b/a Replicamaster.com, Shopreplica.com, Buyhighreplica.com, Ereplcabags.com, Exactwatches.net, Replicahours.com, Swissreplica.US, Thewatchespriceindex.info, and Yourreplicawatch.com

By his Attorney:

LAW OFFICE OF AYAL ABRAMS

By: Ayal Abrams

Ayal Abrams

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San Francisco, California 94117

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Attorneys for Defendant  
Tony Bosini

SO ORDERED this 28th day of October, 2009.

UNITED STATES DISTRICT COURT

IT IS SO ORDERED

Judge Marilyn H. Patel

CHANEL, ET AL. V. BOSINI, ET AL. ST. JUDGE

**PROOF OF SERVICE**

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, and not a party to the above-entitled cause. I am employed by a member of the Bar of the United States District Court of California. My business address is 517 East Wilson Avenue, Suite 202, Glendale, California 91206.

On October 26, 2009, I served on the interested parties in this action with the:

- STIPULATED CONSENT PRELIMINARY INJUNCTION

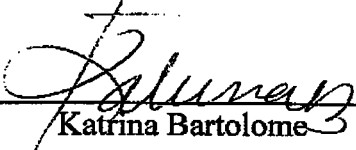
for the following civil action:

CHANEL, INC., et al. v. TONY BOSINI, et al.

by placing a true copy thereof in an envelope to be immediately sealed thereafter. I am readily familiar with the office's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on the same day with postage thereon fully prepaid at Glendale, California in the ordinary course of business. I am aware that on motion of the party served, service presumed invalid if postal cancellation date or postage meter is more than one day after date of deposit for mailing in affidavit.

**Ayal Abrams**  
**600 Page Street, #101**  
**San Francisco, California 94117**

Place of Mailing: Glendale, California  
Executed on October 26, 2009, at Glendale, California

  
\_\_\_\_\_  
Katrina Bartolome